

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

SULCO WAREHOUSING & LOGISTICS, LLC  
and SULLIVAN HOLYoke PROPERTY  
ASSOCIATES, INC.,

Defendants.

Case No. 1:20-cv-12182

**JOINT MOTION FOR ENTRY OF CONSENT DECREE**

Plaintiff Commonwealth of Massachusetts and Defendants Sulco Warehousing & Logistics, LLC and Sullivan Holyoke Property Associates, Inc. (collectively “the Parties”) respectfully ask this Court to enter their proposed Consent Decree, submitted herewith as Exhibit A.

On December 9, 2020, Plaintiff filed a Complaint and a Notice of Commencement of the 45-Day Period with this Court. The Notice informed the Court that the Parties had reached a proposed settlement, and a copy of the Parties’ executed proposed Consent Decree was appended to Plaintiff’s Notice.

Under Section 505(c)(3) of the Clean Water Act, the United States has 45 days from receipt of the proposed Consent Judgment to complete its review and comment to the Court. The United States informed the Parties that the 45-day period ends on January 22, 2020, and it has provided the Parties with a letter stating that it has no objection to the Consent Decree (attached as Exhibit B). Accordingly, the Parties request that the Consent Decree be entered.

January 22, 2021

Respectfully submitted,

COMMONWEALTH OF MASSACHUSETTS

By its attorneys,

MAURA HEALEY  
ATTORNEY GENERAL

*/s/ Nora J. Chorover*

Nora J. Chorover (Bar No. 547352)  
Special Assistant Attorney General  
Emily K. Mitchell (Bar No. 703726)  
Attorney  
Environmental Protection Division  
Office of the Attorney General  
One Ashburton Place, 18th Floor  
Boston, Massachusetts 02108  
Tel: (617) 727-2200, ext. 2642  
[Nora.Chorover@mass.gov](mailto:Nora.Chorover@mass.gov)

Sulco Warehousing & Logistics, LLC and Sullivan  
Holyoke Property Associates, Inc.

By their attorney,

*/s/ Christopher B. Myhrum*

Christopher B. Myhrum (Bar No. 365980)  
Law Office of Christopher B. Myhrum  
1500 Main Street, Suite 2010  
Springfield, MA 01115-5407  
Tel: (413) 342-4145  
[chrismyhrum@myhrumlaw.com](mailto:chrismyhrum@myhrumlaw.com)

CERTIFICATE OF E-SERVICE

I hereby certify that the parties' Joint Statement, filed electronically through the ECF system with the Court on January 22, 2021, has been sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and copies will be sent to those indicated as non-registered participants on January 22, 2021.

*/s/ Nora J. Chorover*  
Nora J. Chorover (Bar No. 547352)